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ATTORNEYS FOR DEFENDANT
TRANSPORT WORKERS UNION LOCAL 556

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

16 DARLA HORNE,)	CASE NO. C-04-4962-PJH
17 Plaintiff,)	STIPULATION EXTENDING
18 v.)	DEADLINE TO COMPLETE NON-
19 SOUTHWEST AIRLINES CO.; TRANSPORT)	EXPERT DISCOVERY;
20 WORKERS UNION OF AMERICA,)	[PROPOSED] ORDER MODIFYING
21 TRANSPORT LOCAL 556,)	CASE MANAGEMENT AND
22 Defendants.)	PRETRIAL ORDER
)	(F.R.C.P. 16(b); F.R.C.P. 26)

STIPULATION

WHEREAS the Court issued an Order re: Stipulation to Modify Case Management and Pretrial Order on November 30, 2005, in which the Court indicated that it would approve a stipulation to continue the trial to March 5, 2007, with a pretrial conference 4 weeks in advance and dispositive motions heard no later than 120 days in advance;

WHEREAS the Court's November 30, 2005 Order also recognized that the parties have requested a modification of the pretrial schedule because the parties need additional time for fact discovery;

WHEREAS the Court issued a Case Management and Pretrial Order on April 25, 2005;

WHEREAS the parties have diligently been engaged in non-expert discovery over the course of the last seven months;

WHEREAS the parties anticipate that between fifteen and eighteen non-expert depositions remain to be taken;

WHEREAS the parties require additional time to complete non-expert discovery beyond the current deadline of December 14, 2005;

WHEREAS the parties have agreed to dates for the remaining depositions, beginning in early February 2006 and continuing through the end of March 2006;

WHEREAS the parties propose to modify the current Case Management and Pretrial Order to provide additional time to complete non-expert discovery;

The parties hereby stipulate to and propose the following revised case management schedule:

TRIAL DATE: Monday, March 5, 2007, at 8:30 a.m.

PRETRIAL CONFERENCE DATE: Thursday, February 1, 2007, at 2:30 p.m.

DISPOSITIVE MOTIONS TO BE HEARD BY: September 6, 2006

NON-EXPERT DISCOVERY CUTOFF: May 12, 2006

DISCLOSURE OF EXPERTS (retained and non-retained): October 31, 2006

EXPERT DISCOVERY CUTOFF: November 28, 2006.

1 IT IS SO STIPULATED.


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4 Dated: 12-6-05


Richard M. Rogers
MAYO & ROGERS
Attorney for Plaintiff Darla Horne

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9 Dated: _____

Angela Dotson
DLA Piper Rudnick Gray Cary US LLP
Attorney for Defendant Southwest Airlines Co.

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14 Dated: 12-5-05


Barbara J. Chisholm
Attorney for Defendant TWU Local 556

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17 **[PROPOSED] ORDER**

18 Upon consideration of the Stipulation of the parties, and good cause appearing therefore,
19 IT IS HEREBY ORDERED that the April 25, 2005 Case Management and Pretrial Order is
20 modified in accordance with the above-stipulated schedule.

21 IT IS SO ORDERED.

22
23 Dated: _____


UNITED STATES DISTRICT JUDGE
HONORABLE PHYLLIS J. HAMILTON

1 IT IS SO STIPULATED.

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3
4 Dated: _____

Richard M. Rogers
MAYO & ROGERS
Attorney for Plaintiff Darla Horne

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8
9 Dated: 12/2/05


Angela Dotson
DLA Piper Rudnick Gray Cary US LLP
Attorney for Defendant Southwest Airlines Co.

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13
14 Dated: _____

Barbara J. Chisholm
Attorney for Defendant TWU Local 556

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16
17 **PROPOSED ORDER**

18 Upon consideration of the Stipulation of the parties, and good cause appearing therefore,
19 IT IS HEREBY ORDERED that the April 25, 2005 Case Management and Pretrial Order is
20 modified in accordance with the above-stipulated schedule.

21 IT IS SO ORDERED.

22
23 Dated: 12/6/05


UNITED STATES DISTRICT JUDGE
HONORABLE PHYLLIS J. HAMILTON